

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STUART FORCE individually and as personal representative of the ESTATE OF TAYLOR FORCE,
et al.,

Plaintiffs,

v.

QATAR CHARITY, QATAR NATIONAL BANK
and MASRAF AL RAYAN,

Defendants.

Case No. 1:20-CV-02578 (BMC)

**DECLARATION OF MICHAEL G. LEWIS IN SUPPORT OF QATAR CHARITY'S
REPLY MEMORANDUM IN SUPPORT OF ITS MOTION TO
DISMISS THE COMPLAINT**

I, Michael G. Lewis, hereby declare and state as follows pursuant to 28 U.S.C. § 1746:

1. I am a licensed attorney with the law firm of DLA Piper LLP (US) located at 1251 Avenue of the Americas, New York, New York 10020. I am in good standing and duly admitted to practice law in the Eastern District of New York. I make this declaration in support of Qatar Charity's Reply Memorandum in Support of Its Motion to Dismiss in the above captioned matter in which DLA Piper serves as counsel for Qatar Charity.

2. Attached hereto as Exhibit 1 is a true and correct copy of a certified English translation, together with a true and correct copy of the original handwritten Arabic and typewritten Hebrew language documents of Fadi Manassra's interrogation testimony, dated September 9, 2015.

3. Attached hereto as Exhibit 2 is a true and correct copy of a U.S. Department of the Treasury archived press release entitled *Treasury Designates the Union of Good*, published on November 12, 2008 (available at <https://home.treasury.gov/news/press-releases/hp1267>).

4. Attached hereto as Exhibit 3 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Arabic language document, of a letter written by Abdullah bin Hussein Al-Ne'ma, Vice-Chairman of the Board of Directors and Managing Director of Qatar Charity, to Essam Youssef, Secretary General of the Union of Good, dated April 2, 2009.

5. Attached hereto as Exhibit 4 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Hebrew language document, of the hearing proceedings before the Judea Military Court in *The Military Advocate General's Office v. Juda Dib Ibrahim Jamal*, Case No. 6011/15, dated September 1, 2017.

6. Attached hereto as Exhibit 5 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Hebrew language document, of the Israeli Military Court of the West Bank's Decision in *Najwan Mohammed Iman Hassan Awda v. Military Public Prosecution*, File. No. 6014/15, dated February 8, 2017.

7. Attached hereto as Exhibit 6 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Hebrew language document, of the Israeli Military Court of Appeals' Decision in *Juda Did Ibrahim Jamal and Fadi Bahjat Abd el-Fateh Manassra v. The Military Advocate General's Office*, Appeal 3189/15, dated December 30, 2015.

8. Attached hereto as Exhibit 7 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Hebrew language document, of the Israeli Military Court of Appeals' Decision in *Najwan Mohammed Iman Hassan Awda v. Military Prosecution*, Appeal 2731/15, dated October 13, 2015.

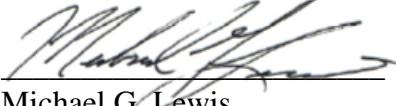
9. Attached hereto as Exhibit 8 is a true and correct copy of a Human Rights Watch report entitled *Born Without Civil Right*, published in November 2019 (available at https://www.hrw.org/sites/default/files/report_pdf/palestine1219_web_0.pdf).

10. Attached hereto as Exhibit 9 is a true and correct copy of a certified English translation, together with a true and correct copy of the original Hebrew language document, of a Notice filed in *Juda Jamal, et al., v. The Military Prosecution*, File No. 3011/15, dated July 27.

11. Attached hereto as Exhibit 10 is a true and correct copy of the U.S. Department of State's list of *Designated Foreign Terrorist Organizations* (available at <https://www.state.gov/foreign-terrorist-organizations/>).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 13, 2022
New York, New York



Michael G. Lewis